

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JULIA ZIMMERMAN,

Plaintiff,

vs.

Case No: 23-cv-11634

Hon. Nancy G. Edmunds

Mag. Judge Anthony P. Patti

ELIZABETH A. PENSLE, D.O., PLLC d/b/a
“**PENSLE** **VEIN** **AND** **VASCULAR**
SURGICAL INSTITUTE” and “**ELIZABETH**
FACE + BODY MED SPA”, a Michigan
Professional Limited Liability Company,
ELIZABETH A. PENSLE, D.O., an Individual,
ELIZABETH MED SPA, PLLC, A Michigan
Professional Limited Liability Company, **DEREK L.**
HILL, D.O., PLLC d/b/a “HILL
ORTHOPEDICS”, a Domestic Professional
Limited Liability Company, **DEREK L. HILL,**
D.O., an Individual, *Jointly and severally in their individual*
and official capacities,

Defendants.

DEBORAH GORDON LAW

Deborah L. Gordon (P27058)
Elizabeth Marzotto Taylor (P82061)
Sarah Gordon Thomas (P83935)
Morry Daniel Hutton (P81188)
Attorneys for Plaintiff
33 Bloomfield Hills Parkway, Suite 220
Bloomfield Hills, Michigan 48304
(248) 258-2500
dgordon@deborahgordonlaw.com
emarzottotaylor@deborahgordonlaw.com
stthomas@deborahgordonlaw.com
mhutton@deborahgordonlaw.com

THE HEALTH LAW
PARTNERS, P.C.

Clinton Mikel (P73496)
Mark V. Breaugh (P84626)
Attorneys for the Defendants
32000 Northwestern Highway, Suite
240
Farmington Hills, MI 48334
Tel: (248)996-8510
cmikel@thehelp.com
mbreaugh@thehelp.com

PLAINTIFF'S EXHIBIT LIST

EXHIBIT 1	Plaintiff's Resume
EXHIBIT 2	Plaintiff's Deposition Transcript
EXHIBIT 3	Plaintiff's Responses to Defendants' Requests to Admit
EXHIBIT 4	Dr. Elizabeth Pensler Deposition Transcript
EXHIBIT 5	Dr. Derek Hill Deposition Transcript
EXHIBIT 6	Offer Letter
EXHIBIT 7	Email regarding start date
EXHIBIT 8	Simrath Davison Deposition Transcript
EXHIBIT 9	January 21, 2023 Complaint
EXHIBIT 10	January 27, 2023 Complaint
EXHIBIT 11	February 23, 2023 AAPA Summary of Medicare Incident To Billing
EXHIBIT 12	March 1, 2023 Complaint
EXHIBIT 13	March 8-13, 2023 Complaint and Response
EXHIBIT 14	March 16, 2023 Complaint
EXHIBIT 15	April 13, 2023 Complaint
EXHIBIT 16	April 14, 2023 Text Messages
EXHIBIT 17	May 8, 2023 Complaint
EXHIBIT 18	May 8, 2023 Text Messages
EXHIBIT 19	Federal Register – CMS COVID Rule
EXHIBIT 20	LARA Business Entity Information

EXHIBIT 21 Unpublished Cases